

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS
(at Boston)**

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| IN RE: NEW ENGLAND COMPOUNDING PHARMACY, INC. PRODUCTS LIABILITY LITIGATION |) | Master File No. 1:13-MD-2419-FDS |
| |) | MDL Docket No. 2419 |
| |) | This Document Relates To: |
| |) | <i>Shaffer v. Cadden</i> , 1:13-cv-10226-FDS |
| |) | <i>Schroder v. New England Compounding</i> |
| |) | <i>Pharmacy, Inc.</i> , 1:13-cv-10227-FDS |
| |) | <i>Adams v. Cadden, et al.</i> , 1:13-cv-10229-FDS |

DECLARATION OF JOSHUA A. KLARFELD

I, Joshua A. Klarfeld, hereby submit this Declaration to the Court pursuant to Local Rule 83.5.3 in support of the Motion to Admit *Pro Hac Vice* and as part of my application for leave to practice in this Court and to appear and participate in the action on behalf of defendant GDC Properties Management, LLC ("GDC), by whom I have been retained, and state:

1. I am a member in good standing of the Bar of the State of Ohio; the Bars of the United States District Courts for the Northern District of Illinois, Eastern District of Michigan, and Northern District of Ohio; and the Bar of the United States Sixth Circuit Court of Appeals.

2. I am an associate with the firm of Ulmer & Berne LLP, (216) 583-7000 (main), (216) 583-7192 (direct).

3. I have been requested by GDC to act as national counsel for GDC in cases pending in this multidistrict litigation and related cases.

4. I have never been subject to any disciplinary action, and no disciplinary actions are pending against me as a member of any bar to which I am admitted.

5. I am familiar with the Local Rules of the United States District Court for the District of Massachusetts.

I declare under the penalty of perjury that the foregoing is true and correct.

/s/ Joshua A. Klarfeld

Joshua A. Klarfeld